

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	(Subchapter V)
Ford City Condominium Association,	)	
	)	Case No. 21-05193
Debtor.	)	
	)	Honorable Judge Carol A. Doyle

**TRUSTEE’S STATEMENT OF FEES IN CONNECTION WITH THE  
MOTION TO COMPEL AND THE MOTION FOR RULE TO SHOW CAUSE**

William Avellone (the “Trustee”), not individually but solely as subchapter V trustee of the Ford City Condominium Association (the “Debtor”), by and through his undersigned counsel, hereby submits this statement (the “Statement”) pursuant to this Court’s *Order Granting Motion to Show Cause* (the “Order”) (ECF No. 218). In support of this Statement, the Trustee states as follows:

1. On August 11, 2022, the Court entered the Order directing the Trustee to serve a statement of fees and costs incurred in connection with the *Trustee’s Motion for Entry of an Order Compelling Defendant to Produce Responsive Documents* (the “Motion to Compel”) (21-ap-183, ECF No. 42) and *the Trustee’s Motion for Rule to Show Cause Why the Property Law Group, LLC Should Not be Held in Contempt for Failure to Comply with the Court’s Order Dated July 21, 2022* (the “Motion for Rule to Show Cause”). (ECF No. 215).

2. The Trustee’s counsel, Freeborn & Peters LLP, incurred fees totaling \$2,924.00 in connection with preparing the Motion to Compel and the Motion for Rule to Show Cause, as evidenced by the Declaration of Elizabeth L. Janczak attached hereto as Exhibit 1.

3. The Trustee submits that these fees are allowable and reasonable under Federal Rule 37(b)(2)(C) because they relate only to time Freeborn & Peters LLP spent in connection with the Property Law Group's failure to comply with discovery requests and orders of this Court.

4. Accordingly, the Trustee requests reimbursement of fees in the total amount of \$2,924.00 which represents the total fees incurred.

Dated: August 18, 2022

**WILLIAM AVELLONE, SUBCHAPTER V  
TRUSTEE OF THE FORD CITY  
CONDOMINIUM ASSOCIATION**

By: /s/ Elizabeth L. Janczak  
One of His Attorneys

Shelly A. DeRousse, Esq.  
Elizabeth L. Janczak, Esq.  
FREEBORN & PETERS LLP  
311 South Wacker Drive, Suite 3000  
Chicago, Illinois 60606-6677  
Telephone: 312.360.6000  
Facsimile: 312.360.6520  
[sderousse@freeborn.com](mailto:sderousse@freeborn.com)  
[ejanczak@freeborn.com](mailto:ejanczak@freeborn.com)

*Counsel for the Trustee*

**CERTIFICATE OF SERVICE**

I, Elizabeth L. Janczak, an attorney, hereby certify that on August 18, 2022, I caused a true and correct copy of the foregoing *Trustee's Statement of Fees in Connection with the Motion to Compel and the Motion for Rule to Show Cause*, to be filed electronically with the Court and served upon the following parties by the manners listed.

\_\_\_\_\_/s/ Elizabeth L. Janczak

**CM/ECF Service List**

William B. Avellone	bill.avellone@charteredmgt.com
Peter C Bastianen	bkpleadingsNORTHERN@il.cslegal.com
Matthew R Bowman	rbowman@lgattorneys.com
Scott R Clar	sclar@cranesimon.com, mjoberhausen@cranesimon.com;
	asimon@cranesimon.com
Jacob Comrov	jcomrov@cranesimon.com, jdcomrov@gmail.com
John J Conway	johnconway@shlawfirm.com
Jeffrey L. Gansberg	jeffrey.l.gansberg@usdoj.gov
Charles A King	chuck.king@cityofchicago.org
Patrick S Layng	USTPRegion11.ES.ECF@usdoj.gov
Ebony Lucas	attorney@creditpeaceofmind.com; elucas@plgesq.com
Phyllis Y Price	pprice@pricelawofc.com
Peter A Siddiqui	peter.siddiqui@katten.com, ecfdoCKET@kattenlaw.com
Shanita Q Straw	sstraw@goldenlawpc.com, G5700@notify.cincompass.com

**U.S. Mail Service List**

The Property Law Group, LLC  
c/o Ebony Lucas, Registered Agent  
641 E. Pershing Road, Unit E  
Chicago, IL 60653